

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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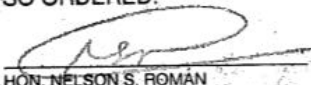
August 25, 2023

The Honorable Nelson S. Román  
United States District Court Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

The Court GRANTS Defendant's request, as the Supervising Pre-Trial Officer does not object and the Government takes no position. The terms of Defendant's release are temporarily modified to allow him to travel to Allentown, Pennsylvania on September 3, 2023 for a one-day family visit to a water park. The Clerk of the Court is directed to terminate the motion at ECF No. 38.

Re: **United States v. Miguel Abreu**  
**23-Cr-00067 (NSR)**

Dated: August 29, 2023  
White Plains, NY

SO ORDERED:  
  
HON. NELSON S. ROMÁN  
UNITED STATES DISTRICT JUDGE

Dear Honorable Román:

I am writing to ask that Your Honor please temporarily modify the terms of Mr. Abreu's release to allow him to travel to Pennsylvania on September 3, 2023 for a one-day family visit to a water park. As background, Mr. Abreu has been on supervised release since July, 2022 and the conditions of his release prohibit Mr. Abreu from travelling outside of the eastern and southern districts of New York.<sup>1</sup> If approved, Mr. Abreu would travel with his family to Dorney Park and Wildwater Kingdom, a large water park, in Allentown Pennsylvania on September 3, 2023. He would return to his home in New York that same day.

I have communicated with Supervisory US Pretrial Services Officer Cynthia Labrovic Diaco, and Officer Labrovic does not object to this request. I have also communicated with AUSA Kingdar Prussien, and Mr. Prussien informed me that the government takes no position regarding this request.

Thank you for your consideration of this request.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 8/29/2023

Sincerely,

/s/

Benjamin Gold  
Assistant Federal Defender

cc: A.U.S.A Kingdar Prussien  
Supervisory US Pretrial Services Officer Cynthia Labrovic Diaco

<sup>1</sup> Mr. Abreu is currently subject to an 11:30pm curfew, but this trip would not affect his curfew as he would be able to return home before 11:30pm on September 3, 2023.